

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

BARRY C. HONIG, GRQ CONSULTANTS, INC., GRQ CONSULTANTS, INC. 401K, GRQ CONSULTANTS, INC. ROTH 401K FBO BARRY HONIG, GRQ CONSULTANTS, INC. ROTH 401K FBO RENEE HONIG, HS CONTRARIAN INVESTMENTS, LLC, ROBERT S. COLMAN, and ROBERT S. COLMAN TRUST UDT 3/13/85,

Plaintiffs,

v.

JOHN DAVID HANSEN and GREGORY P. HANSON,

Defendants.

Case No. 1:20-cv-05872-AKH (Lead Case)

**GRANDER PLAINTIFFS' NOTICE OF  
MOTION FOR LEAVE TO FILE AN  
AMENDED COMPLAINT**

GRANDER HOLDINGS, INC., GRANDER HOLDINGS, INC. 401K PSP, BRAUSER FAMILY TRUST 2008, MICHAEL BRAUSER, DANIEL BRAUSER, BENJAMIN BRAUSER, GREGORY BRAUSER, and JOSHUA BRAUSER,

Plaintiffs,

v.

JOHN DAVID HANSEN and GREGORY P. HANSON,

Defendants.

Case No. 1:20-cv-08618-AKH

**PLEASE TAKE NOTICE THAT**, upon the accompanying Memorandum of Law in Support and Declaration of Justin B. Kaplan, Plaintiffs, Grander Holdings, Inc., Grander Holdings, Inc. 401K PSP, Brauser Family Trust 2008, Michael Brauser, Daniel Brauser, Benjamin Brauser,

Gregory Brauser, and Joshua Brauser, through undersigned counsel and pursuant to Federal Rules of Civil Procedure 15(a) and Local Civil Rule 6.3, shall move before the Honorable Alvin K. Hellerstein, United States District Judge for the Southern District of New York, at the United States Courthouse, 500 Pearl Street, Courtroom 14D, New York, New York 10007, on a date and time to be determined by the Court, will and hereby do move to grant Plaintiffs leave to file their Proposed Sixth Amended Complaint.

Dated: May 25, 2022  
Miami, Florida

Respectfully submitted,

**NELSON MULLINS RILEY &  
SCARBOROUGH**

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By: /s/ Justin B. Kaplan  
Fla. Bar No. 0033725

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(Admitted pro hac vice)